REMARKS/ARGUMENTS

Claim 16 has been cancelled. Claims 11-15 have been amended and are still pending in this application.

Response to Claim Objections

The informalities objected to by the Examiner in the Office Action dated June 29, 2006, have been addressed by Applicant's present amendments to claim 11. Applicant respectfully requests that these objections be withdrawn.

Response to Claim Rejections under 35 USC §112

The Office Action rejected independent claim 11, and claims 12-16 dependent therefrom, under 35 U.S.C. §112 on the basis that the language "a storage location that stores the defined identification code for use in comparing the control code comprising the remote control device identification code and/or the server identification code with the defined identification code stored on the jukebox to determine whether or not the jukebox will respond to control code from the remote control code" allegedly was not supported by the specification. Applicant traverses this rejection.

Applicant first notes that the corresponding portion of independent claim 11 now reads "a storage location that stores the transmitted remote control identification code for use in comparing the saved remote control identification code and/or the server identification code with the transmitted remote control identification code stored on the

jukebox to determine whether or not the jukebox will respond to control codes from the remote control transmitting the remote control identification code..."

The Office Action asserts that there is no support for "a storage device that stores the defined identification code (code transmitted by remote control in subsequent time after learning mode)." The corresponding language now reads "a storage location that temporarily stores the transmitted remote control identification code." While the specification does not explicitly call out this storage location or the storing, one of ordinary skill in the art would have understood that to perform the comparison between the saved remote identification code (stored during learning mode processing) and the transmitted remote identification code, the jukebox device must inherently store the transmitted code.

Further, the Office Action itself supports this position on page 7, lines 1-7, where it notes "Inherently, the jukebox comprises a storage location that stores the defined identification code... for use in comparing the stored identification code with the defined identification code..." While the Office Action is referring to a jukebox of the alleged prior art, the statement makes it clear that one of skill in the art would know that to perform a comparison, Applicant's jukebox device must at least temporarily store the transmitted signal.

The Office Action also alleges that there is no support for a comparison between the "defined identification code" (now called "the remote control identification code") and the "server identification code." Applicant points out that the "server identification

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code" is simply another remote identification code transmitted to a jukebox device from a central server (Applicant's Specification page 10, lines 19-25). Applicant's disclosure teaches comparing a remote control code stored by a reproduction system with a code sent by a remote control when the remote control is used (Applicant's Specification page 10 lines 6-14). Since the server identification code is a remote control code that is stored by a jukebox device, one of ordinary skill in the art would have understood that the jukebox device was operable to compare the server identification code to a code transmitted from a remote control device.

Applicant has directed the Examiner to the language in the specification that supports Applicant's claims, and therefore Applicant respectfully requests that the rejections under §112 be withdrawn.

Response to Claim Rejections under 35 USC §103

The Examiner asserts that claim 11 is unpatentable over Nathan (WO 96/12258) ("Nathan") in view of Goldstein (US 5,410,326) ("Goldstein") and Cohen (US 6,198,408) ("Cohen"). Applicant traverses these rejections.

First, according to the Office Action, Nathan comprises, *inter alia*, "each of the remote control device [sic]...being operable to control one of the jukebox devices when the jukebox device recognizes a control code comprising a defined identification code (e.g. command code comprising a registration number) transmitted from the remote control device" (This language now reads "each of the remote control devices … is

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operable to control one of said jukebox devices only when said jukebox device recognizes a control signal comprising a remote control identification code identifying the remote control device, stored on the remote control device and transmitted from the remote control device, wherein the control signal further comprises a key code sent to control a selected feature of the jukebox"). Nathan does disclose "input by an infrared remote control device," (paragraph 87) and Nathan discloses "if the system is started with a correct registration number it then directly enters the "in service" mode" (paragraph 75). The disclosure does not, however, link the registration number to the signal from the remote control device. Nathan does not teach that this registration number is a "remote control identification code" as claimed by Applicant. Nor does Nathan teach the remote control device sending a signal comprising a remote control identification code. Neither does Nathan teach "a control signal comprising a remote control identification code identifying the remote control device, stored on the remote control device and transmitted from the remote control device."

The Office Action also alleges that Nathan discloses "a remote control code storage mechanism that stores the identification code" (now, in revised claim 11, "remote control code storage that stores a saved remote control identification code sent by an associated remote control device"). Nathan does not teach a remote control having a remote control identification code, therefore Nathan cannot teach storing "a saved remote control identification code sent by an associated remote control device." The Office Action directs Applicant's attention to paragraphs 75 & 76 to support this allegation, but

while those paragraphs discuss a registration number, a software series number, and user

information, nothing in those paragraphs discloses storing an *identification code of a*

remote control device.

Further, the Office Action alleges that "the jukebox only performs the requested

function when the registration number is validated" and "[i]nherently the jukebox

comprises a storage location that stores the defined identification code (e.g. registration

number or code in the signal received from remote control device in "in service" mode)

for use in comparing the stored identification code with the defined identification code

(e.g. registration number or code in the signal received from remote control device in "in

service" mode) to determine whether or not the jukebox will respond to the remote

control device." To support this allegation, the Office Action again refers to paragraphs

75-76 discussing a registration number and paragraph 129 referring to local system

security. Nathan does not teach that the registration number discussed in any of these

paragraphs is a remote control identification code. Rather, Nathan appears to teach that

the registration number is used to identify the jukebox, as opposed to a remote control

device. Paragraph 129 makes this clear – "each *system* is linked to a local controller

system according to a preestablished time pattern for acquisition of the approval signal *in*

the form of the registration number authorizing it (the system) *to operate*" (emphasis and

parenthetical added). Nathan also does not teach comparison of a saved identification

code with a transmitted remote control identification code to determine whether or not

the jukebox will respond to control signals from the remote control device.

Additionally, the Office Action alleges that the remote control device disclosed in Nathan "inherently... compris[es] a key that triggers, when actuated, a signal comprising only the defined identification code which facilitates the storing of this defined code by the jukebox." To support this allegation, the Office Action gives an example "activating a key for volume down in registration mode/learning mode, and the code associated with this key is sent to the jukebox in the first use and stored. Subsequently use of this key will only send code that commands that jukebox to perform volume down control." Applicant cannot find any disclosure in Nathan that would support such an example of teaching the jukebox device which remote control keys perform which functions.

Further, as is apparent from Applicant's disclosure and claims, the "defined identification code" (now called "a remote control identification code") is not the code for instructing the jukebox device to modify a parameter (such as volume down), but rather code sent to identify a particular remote control device. Since Nathan does not teach a remote control having a "remote control identification code," Nathan *cannot* teach a remote control device inherently comprising "a key that triggers, when actuated, a signal comprising only the defined identification code ('remote control identification code')" (parenthetical added to reflect amended claim 11 language).

The Office Action correctly asserts that Nathan does not specifically disclose "storing a remote control device identification code sent by the associated remote control device" and uses the disclosure of Cohen to overcome this deficiency of Nathan.

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Cohen, however, does not teach a "remote control code storage that stores a saved remote control identification code sent by an associated remote control device." Cohen discloses "a converter device which includes a receiver for receiving the command signal, a microprocessor for converting the command signal according to a predetermined conversion process compatible with various types of command signals, to a code unique to that particular remote control transmitter, and a storage device for storing the unique code" (Col 1 lines 52-58). According to Cohen, "switch 100 receives a signal from the remote control unit and stores it *after processing to convert it to a unique code* to be compared with any subsequent signal received from a remote control unit" (emphasis added). This is not "storing a saved remote control identification code *sent by* an associated remote control device" (emphasis added). A remote control identification code is a code that identifies a particular remote control. Cohen discloses no such signal identifying a remote control. Cohen "convert[s] [the received signal] to a unique code to be compared with any subsequent signal." It is apparent that the signal taught in Cohen does not *identify the remote control device*, but rather *identifies a signal from the specific button* that was pressed on the remote control device. Unlike in Applicant's invention, the learning process of Cohen would need to be repeated if the user decides to operate the invention of Cohen with an alternative code (e.g. different button) of the same remote control unit (Col 5 lines 13-18).

Conclusion

Applicant has corrected the informalities in claim 11 objected to by Examiner.

Withdrawal of the objections is respectfully requested.

In light of Examiner's 35 U.S.C. §112 rejection, Applicant has directed Examiner

to material in Applicant's specification that provides support for Applicant's independent

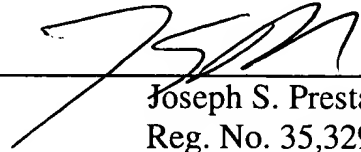claim 11. Applicant respectfully requests withdrawal of this rejection.

Applicant respectfully submits that the combination of Nathan, Cohen, and

Goldstein lacks many of the claimed elements in amended claim 11. For at least this

reason, Applicant has traversed the rejection under 35 U.S.C. §103(a). Reconsideration

and withdrawal of the rejection are respectfully requested.

In view of the foregoing, independent claim 11 and claims 12-15 dependent

therefrom are believed to be in condition for allowance and action to that end is earnestly

and respectfully solicited.

Respectfully submitted,

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